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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,

Plaintiff,

Vs.

Commonwealth of the Northern Mariana Islands, Arnold Palacios, governor of CNMI, in his official and personal capacities; Edward C. Deleon Guerrero, Chairman of CCC, in his official and personal capacities; Rafael S. Demapan, Vice Chairman of CCC, in his official and personal capacities; Mariano Taitano, Commissioner of CCC, in his official and personal capacities; Martin Mendiola, Commissioner of CCC, in his official and personal capacities; Ramon M. Dela Cruz, Commissioner of CCC, in his official and personal capacities; Andrew Yeom, Executive Director of CCC, in his official and personal capacities;

Defendants.

Case No. 1:24-cv-00001

**PLAINTIFF IPI'S RESPONSE TO  
 ORDER TO SHOW CAUSE (ECF NO.  
 33).**

In response to the Court's Order to Show Cause why Court relief is required by April 2, 2024 (ECF No. 33). Plaintiff IPI responds the following:

1 Michael Chen is the attorney of record before Commonwealth Casino Commission (CCC)  
2 with respect to the Revocation Hearing took place between February 28, 2024, to March 1, 2024.

3 After the hearing, Plaintiff IPI was officially notified by CCC that the deliberation and  
4 decision for the Casino License Revocation Hearing is scheduled for April 2, 2024. (ECF No. 24-  
5 3.)

6 After the hearing and after the filing of the second TRO, (ECF No. 24), I was not notified  
7 by any means (including but not limited to email, text message, phone calls) by any members of  
8 CCC, including its commissioners, executive directors, their legal counsels, or employees about  
9 the continuation of the deliberation and decision, which was scheduled to take place on April 2,  
10 2024.

11 I don't know for certain whether the deliberation and decision has been continued and the  
12 location and new time and date for the continued deliberation and decision will be.

13 I did find a news article on [www.mvariety.com](http://www.mvariety.com), which states that the deliberation for the  
14 revocation hearing is continued to April 9, 2024.

15 I just confirmed with Mr. Howyo Chi, director of IPI, that he was notified by the executive  
16 director of CCC that the revocation hearing was continued in a WhatsApp call on Thursday, March  
17 28, 2024.

18 Should the Commissioners confirm with the Court that the deliberation and decision will  
19 be continued to April 9, 2024, as the news article stated, it is not necessary for the Court to provide  
20 the requested relief by April 2, 2024.

21 Should the Commissioners or an authorized representative of CCC do not confirm with the  
22 Court that deliberation and decision on the license revocation hearing is continued to April 9, 2024,  
23 as ordered by the Court, IPI would have to assume that the deliberation and decision may still  
24 move forward as scheduled since the only written notice about the deliberation and decision date  
25 from CCC indicates that the revocation and decision will take place on April 2, 2024. As such, IPI  
26 would think it is still necessary for the Court to grant the requested relief before 9:00 AM on April  
27 2, 2024.  
28

1 Dated: April 1, 2024  
2 Saipan, CNMI

Respectfully submitted,

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